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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE MARILYN L. HUFF)

UNITED STATES OF AMERICA, Plaintiff, v. DANIEL FIGUEROA-MORENO, Defendant.	Case: 08CR0270-H Date: April 7, 2008 Time: 2:00 p.m. MOTION FOR ORDER TO SHORTEN TIME

Daniel Figueroa, by and through counsel, moves this Court for an order shortening time to file his Sentencing Memo to four days instead of five days for the following reasons:

The parties completed the safety valve requirements this afternoon. Application of safety valve affected the Sentencing Guidelines in this case, and the sentencing recommendations could not be finalized prior to completion of all of the requirements of safety valve, since it involved a potential 10-year minimum sentence.

Respectfully submitted,

DATED: April 3, 2008

/s/ Andrew Nietor
ANDREW K. NIETOR
Attorney for Defendant Figueroa